

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC.; and
HONEYWELL INTELLECTUAL PROPERTIES
INC.;

Plaintiffs,

V.

APPLE COMPUTER, INC., et al.

Defendants.

Civil Action No. 04-1338 (***)

Civil Action No. 04-1337 (***)

Civil Action No. 04-1536 (***)

(Consolidated)

NOTICE OF DEPOSITION
OF PLAINTIFFS HONEYWELL INTERNATIONAL INC. AND HONEYWELL
INTELLECTUAL PROPERTIES INC. PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and pursuant to Delaware Local Rules 30.1 through 30.6, Optrex America, Inc. will take the deposition upon oral examination of plaintiffs Honeywell International Inc. (“HII”) and Honeywell Intellectual Properties Inc. (“HIPI”), and specifically the witness or witnesses designated by HII and HIPI as officers, managing agents, directors, agents, employees or other person(s) who are most knowledgeable and can testify on their behalf with respect to each of the categories identified in Appendix A hereto, commencing at 9:00 a.m. on October 5, 2007, before a notary public or other officer duly authorized to administer oaths at the Hyatt Regency Phoenix, 122 North Second Street, Phoenix, Arizona, USA 85004, or such other location as mutually agreed upon by counsel. The deposition will also be videotaped.

PLEASE TAKE FURTHER NOTICE that HII and HIPI are requested to identify, on or before October 1, 2007, their designated witnesses and the matters to which each will testify.

You are invited to attend and cross-examine.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

September 20, 2007

Karen L. Pascale (#2903) [kpascale@ycst.com]

Karen E. Keller (#4489) [kkeller@ycst.com]

The Brandywine Building

1000 West Street, 17th Floor

Wilmington, DE 19801

(302) 571-6600

- and -

Richard D. Kelly

Andrew M. Ollis

Alexander E. Gasser

John F. Presper

OBLON, SPIVAK, MCCLELLAND,

MAIER & NEUSTADT, P.C.

1940 Duke Street

Alexandria, VA 22314

(703) 413-3000

Attorneys for Optrex America, Inc.

APPENDIX A

Definitions

- A. “HII” shall mean plaintiff Honeywell International Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.
- B. “HIPI” shall mean plaintiff Honeywell Intellectual Properties Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.
- C. “Plaintiffs” or “Honeywell” shall mean HII and HIPI both individually and collectively.
- D. “LCD” shall mean liquid crystal display.
- E. “LCD Module” shall mean an LCD including a liquid crystal panel and other components for incorporation into another product to provide a viewable image to a user.

Topics

1. The Society for Information Display Symposium 2000 Trip Report that appears to be authored by R. David Lanning, produced at HW025504-HW025512.
2. Any report or document other than HW025504-HW025512 prepared by a Honeywell employee, agent, or officer reporting on or summarizing any Society for Information Display Symposium, from the 1994-2002 timeframe.
3. The rights, privileges, responsibilities, and duties of Honeywell as a “Sustaining Member” of the Society for Information Display, for the particular years that it was such a “Sustaining Member.”
4. The LCD Module samples provided by Optrex to Honeywell in connection with Honeywell’s development of the KLN94 display, particularly including the modules shown in HW025501-25502 and discussed in the second and third paragraphs of Denise Rahne’s August 29, 2007 letter to Alexander Gasser.
5. LCD Module samples provided or demonstrated by Optrex to Honeywell between 1994-2002.

CERTIFICATE OF SERVICE

I, Karen L. Pascale, hereby certify that on September 20, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

John R. Alison	john.alison@finnegan.com
Parker H. Bagley	pbagley@milbank.com
Robert J. Benson	rjbenson@hhlaw.com
Elizabeth L. Brann	elizabethbrann@paulhastings.com
Christopher E. Chalsen	cchalsen@milbank.com
Hua Chen	huachen@paulhastings.com
Arthur G. Connolly, III	aconnollyIII@cblh.com, dkt@cblh.com; telwell@cblh.com
Frederick L. Cottrell, III	cottrell@rlf.com
Francis DiGiovanni	fdigiovanni@cblh.com, dkt@cblh.com, ljarrell@cblh.com, rlitterst@cblh.com
Kevin C. Ecker	kecker@stroock.com
Amy Elizabeth Evans	aevans@crosslaw.com
York M. Faulkner	york.faulkner@finnegan.com
Christopher J. Gaspar	cgaspar@milbank.com
Alexander E. Gasser	agasser@oblon.com
Maria Granovsky	mgranovsky@mnat.com
Alan M. Grimaldi	grimaldia@howrey.com
Thomas C. Grimm	tcgefiling@mnat.com
Thomas Lee Halkowski	halkowski@fr.com, dob@fr.com, jrm@fr.com, kxk@fr.com, sub@fr.com
Angie Hankins	ahankins@stroock.com
Richard L. Horwitz	rhorwitz@potteranderson.com, iplitigation@potteranderson.com, iplitigation2@potteranderson.com, mbaker@potteranderson.com, nmcmenamin@potteranderson.com
John T. Johnson	jjohnson@fr.com, lperez@fr.com; autuoro@fr.com
Robert J. Katzenstein	rjk@skfdelaware.com, eys@skfdelaware.com
Nelson M. Kee	keen@howrey.com
Richard D. Kelly	rkelly@oblon.com
Stephen S. Korniczky	stephenkorniczky@paulhastings.com
Hamilton Loeb	hamiltonloeb@paulhastings.com
David J. Margules	dmargules@BMF-law.com, lheritage@bmf-law.com

David Ellis Moore	dmoore@potteranderson.com, ntarantino@potteranderson.com
Carolyn E. Morris	carolynmorris@paulhastings.com
Arthur I. Neustadt	aneustadt@oblon.com
Matt Neiderman	mneiderman@duanemorris.com
Elizabeth A. Niemeyer	elizabeth.niemeyer@finnegan.com
Andrew M. Ollis	aollis@oblon.com
Adam Wyatt Poff	apoff@ycst.com, corporate@ycst.com; corpcal@ycst.com
Leslie A. Polizoti	lpolizoti@mnat.com
John F. Presper	jpresper@oblon.com
Alana A. Prills	alanaprills@paulhastings.com
Steven J Rizzi	steven.rizzi@weil.com
Lawrence Rosenthal	lrosenthal@stroock.com
Avelyn M. Ross	aross@velaw.com
Philip A. Rovner	provner@potteranderson.com, iplitigation@potteranderson.com, mstackel@potteranderson.com, mcmenamin@potteranderson.com
Carl E. Schlier	cschlier@oblon.com
John M. Seaman	jseaman@bmf-law.com, jfielder@bmf-law.com
Chad Michael Shandler	shandler@rlf.com, pstewart@rlf.com
John W. Shaw	jshaw@ycst.com, corporate@ycst.com; ptorterotot@ycst.com; corpcal@ycst.com
Matthew W. Siegal	msiegal@stroock.com
Monte Terrell Squire	msquire@ycst.com, corpcal@ycst.com, corporate@ycst.com
Roderick B. Williams	rickwilliams@velaw.com, smendoza@velaw.com
Edward R. Yoches	bob.yoches@finnegan.com
Steven J. Balick	sbalick@ashby-geddes.com, dfioravanti@ashby-geddes.com, dharker@ashby-geddes.com, jday@ashby-geddes.com, lmauire@ashby-geddes.com, mkippp@ashby-geddes.com, nlopez@ashby-geddes.com, tlydon@ashby-geddes.com
William F. Taylor, Jr.	wtaylor@mccarter.com
John G. Day	jday@ashby-geddes.com, dfioravanti@ashby-geddes.com, dharker@ashby-geddes.com, lmauire@ashby-geddes.com, mkippp@ashby-geddes.com, nlopez@ashby-geddes.com, sbalick@ashby-geddes.com, tlydon@ashby-geddes.com
Barry M. Graham	barry.graham@finnegan.com
Darren M. Jiron	darren.jiron@finnegan.com

William J. Marsden, Jr. marsden@fr.com, dob@fr.com, kilby@fr.com, manis@fr.com,
sub@fr.com

I further certify that on September 20, 2007, I caused a copy of the foregoing document to be served upon the following counsel of record as indicated below:

By Hand Delivery and E-Mail

Thomas C. Grimm [tgrimm@mnat.com]
Benjamin J. Schladweiler [bschladweiler@mnat.com]
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
Wilmington, DE 19899-1347
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Steven J. Balick [sbalick@ashby-geddes.com]
John G. Day [jday@ashby-geddes.com]
ASHBY & GEDDES
500 Delaware Avenue
P.O. Box 1150
Wilmington, DE 19899
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

By E-Mail

Martin R. Lueck [MRLueck@rkmc.com]
Matthew L. Woods [MLWoods@rkmc.com]
Jacob S. Zimmerman [JSZimmerman@rkmc.com]
Marta M. Chou [MMChou@rkmc.com]
Stacie E. Oberts, Esquire [SEOoberts@rkmc.com]
ROBINS, KAPLAN, MILLER & CIRESI LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Alan E. McKenna [AEMckenna@rkmc.com]
Anthony A. Froio [AAFroio@rkmc.com]
ROBINS, KAPLAN, MILLER & CIRESI LLP
111 Huntington Avenue, Suite 1300
Boston, MA 02199-7610
Attorneys for Honeywell International Inc. and Honeywell Intellectual Properties Inc.

Philip A. Rovner [provner@potteranderson.com]
POTTER, ANDERSON & CORROON
6th Floor, Hercules Plaza
1313 N. Market Street
Wilmington, DE 19801
Attorneys for FUJIFILM Corporation and FUJIFILM U.S.A. Inc.

Richard L. Horwitz [rhorwitz@potteranderson.com]
David E. Moore [dmoore@potteranderson.com]
POTTER ANDERSON & CORROON
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box. 951
Wilmington, DE 19801
Attorneys for Samsung SDI America, Inc., and Samsung SDI Co., Ltd.

Matt Neiderman [MNeiderman@duanemorris]
DUANE MORRIS LLP
1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246
Attorneys for InnoLux Display Corporation

David J. Margules [dmargules@bmf-law.com]
BOUCHARD MARGULES & FRIEDLANDER, P.A.
222 Delaware Avenue, Suite 1400
Wilmington, DE 19801
Attorneys for Citizen Watch Co., Ltd., and Citizen Displays Co., Ltd.

YOUNG CONAWAY STARGATT & TAYLOR, LLP
/s/ Karen L. Pascale

September 20, 2007

Karen L. Pascale (#2903) [kpascale@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600
Attorneys for Optrex America, Inc.